

Settlement Date: August 1, 2016 at 3:00 p.m.

Objections Due: August 1, 2016 at 2:30 p.m.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

Gawker Media LLC,

Plaintiff,

v.

Meanith Huon, Ashley Terrill, Teresa Thomas, Shiva  
Ayyadurai, Terry Gene Bollea, Charles C. Johnson, and  
Got News LLC,

Defendants.

Adv. Proc. No. 16-01085 (SMB)

**NOTICE OF SETTLEMENT**

**NOTICE OF SETTLEMENT OF ORDER GRANTING PRELIMINARY INJUNCTION  
THROUGH SEPTEMBER 3, 2016 WITH RESPECT TO CERTAIN LITIGATION**

**PLEASE TAKE NOTICE** that, pursuant to Rule 9074-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York, the proposed order granting the motion of Gawker Media LLC for a preliminary injunction through September 3, 2016 with respect to certain litigation, annexed hereto as Exhibit A (the “Proposed Order”), will be presented for settlement and entry to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at Room 723 of the United States Bankruptcy Court for the Southern District

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.’s offices are located at Andrássy ut 66. 1062 Budapest, Hungary.

of New York, One Bowling Green, New York, NY 10004-1408 (the “Court”) for signature on  
**Monday, August 1, 2016 at 3:00 p.m. (prevailing Eastern Time).**

**PLEASE TAKE FURTHER NOTICE** that, objections to the entry of the Proposed Order or proposed counter-orders must be in writing and shall be filed with the Court (with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein) and served so as to be actually received by the undersigned not later than **2:30 p.m. on Monday, August 1, 2016 (prevailing Eastern Time).**

**PLEASE TAKE FURTHER NOTICE** that, unless objections or proposed counter-orders are filed and served as set forth above, the Proposed Order will be deemed uncontroverted and may be entered by the Court.

Dated: New York, NY  
July 27, 2016

/s/ Gregg M. Galardi  
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**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Meanith Huon, Ashley Terrill, Teresa Thomas, Shiva  
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Got News LLC,

Defendants.

Adv. Proc. No. 16-01085 (SMB)

**ORDER GRANTING PRELIMINARY INJUNCTION THROUGH  
SEPTEMBER 3, 2016 WITH RESPECT TO CERTAIN LITIGATION**

**WHEREAS**, the Debtors filed a motion (the “Motion”)<sup>2</sup> pursuant to sections 105 and 362 of the Bankruptcy Code requesting a preliminary and permanent injunction and for an order extending the automatic stay under section 362 of the Bankruptcy Code to the following litigations, among others (the “Litigations”):

- (i) *Ashley Terrill v. Gawker Media, LLC, et al.*, No. 16-CV-00411 (S.D.N.Y.);
- (ii) *Ayyadurai v. Gawker Media, LLC, et al.*, No. 16-CV-10853 (D. Mass.); and

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.’s offices are located at Andrássy út 66. 1062 Budapest, Hungary.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

(iii) *Charles C. Johnson, et al. v. Gawker Media, LLC, et al.*, No.15CECG03734  
(Cal. Super. Ct. Fresno Cty.); and

**WHEREAS**, the plaintiffs in the Litigations did not oppose the relief requested in the Motion and a hearing having been held on the Motion on July 19, 2016;

**NOW, THEREFORE, IT IS HEREBY:**

**ORDERED** that for the reasons set forth on the record at the hearing held in the above-captioned adversary proceeding on July 19, 2016, the Motion is **GRANTED**; and it is further

**ORDERED** that the preliminary injunction granted pursuant to the Motion shall be in effect with respect to the Litigations through and including September 3, 2016; and it is further

**ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: July \_\_\_\_, 2016  
New York, New York

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE